

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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BARBARA STROUGO, Individually and on Behalf of
All Others Similarly Situated,

Plaintiff(s),

-against-

BARCLAYS PLC, BARCLAYS CAPITAL INC.,
ROBERT DIAMOND, ANTONY JENKINS,
CHRISTOPHER LUCAS, TUSHAR MORZARIA, and
WILLIAM WHITE,

Defendants.
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Civil Action No.:
1:14-cv-05797-SAS

**ORAL ARGUMENT
REQUESTED**

**DEFENDANTS' NOTICE OF MOTION TO
DISMISS THE CONSOLIDATED AMENDED COMPLAINT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and the Declaration of Jeffrey T. Scott dated January 20, 2015 (and exhibits thereto), and upon all prior proceedings, pleadings, and papers filed herein, defendants Barclays PLC, Barclays Capital Inc., Robert Diamond, Antony Jenkins, Christopher Lucas, Tushar Morzaria, and William White (collectively, "Defendants") will move this Court, before the Honorable Shira A. Scheindlin, on a date and at a time to be determined by the Court, in Courtroom 15C of the Daniel Patrick Moynihan United States Courthouse at 500 Pearl Street, New York, New York 10007, pursuant to the Private Securities Litigation Reform Act of 1995 and Rules 9(b) and 12(b)(6) of the Federal Rules of Civil Procedure, for an Order dismissing with prejudice all claims against Defendants in the Consolidated Amended Complaint in this action, and for such other relief as the Court deems just and proper.

Dated: January 20, 2015
New York, New York

Respectfully submitted,

/s/ Jeffrey T. Scott

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CERTIFICATE OF PRE-MOTION LETTER EXCHANGE

Pursuant to Rule IV.B of the Individual Rules and Procedures of the Honorable Shira A. Scheindlin, I hereby certify the following: (i) on January 13, 2015, I sent a letter to Counsel for Plaintiffs regarding Defendants' intention to file a motion to dismiss the Amended Complaint, outlining the bases for Defendants' motion, and requesting that Plaintiffs' Counsel withdraw the Amended Complaint; and (ii) on January 16, 2015, Plaintiffs' Counsel sent me a letter indicating that Plaintiffs would not withdraw the Amended Complaint.

/s/ Jeffrey T. Scott
Jeffrey T. Scott

CERTIFICATE OF SERVICE

I hereby certify that I am admitted to the Bar of this Court and that, on January 20, 2015, true copies of the foregoing Notice of Motion to Dismiss the Consolidated Amended Complaint and Certificate of Pre-Motion Letter Exchange, dated January 20, 2015, along with all papers in support of Defendants' Motion, were served electronically on all counsel of record.

/s/ Jeffrey T. Scott
Jeffrey T. Scott